IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA   )   CRIMINAL NO. **1:05cr532**
)
        v.   )
)
CANDICE ROSE MARTINEZ,   )
)
        Defendant.   )

STATEMENT OF FACTS

Were this case to go to trial, the government would prove beyond a reasonable doubt by competent and admissible evidence the following:

1.   A few days before October 12, 2005, defendant **CANDICE ROSE MARTINEZ** (hereinafter: **MARTINEZ**) and Dave Chatram Williams (hereinafter: Williams) agreed to rob the Wachovia Bank branch located in Vienna, Virginia. The two of them composed a demand note and typed it using his computer and printer. The note threatened to shoot the teller or someone next to him or her if the teller failed to surrender the bank's money. The two picked the Wachovia Bank because Williams had previously been employed by that bank and was familiar with its internal operations.

2.   On October 12, 2005, **MARTINEZ** walked into the Wachovia Bank located at 212 E. Maple Avenue, Vienna, Virginia, carrying a box to which the demand note was affixed. She moved directly to the teller counter and displayed the box and the note. The teller, fearing that she might be harmed, gave **MARTINEZ** the money

from her teller station, and **MARTINEZ** left the bank, entered a car driven by Williams and the two drove off. A later inventory of the teller's station disclosed that it was short approximately $14,480 in United States currency.

3.   On or about October 21, 2005, defendant **MARTINEZ** and Williams drove to the Wachovia Bank branch located at 8441 Sudley Road, Manassas, Virginia, where **MARTINEZ** entered the bank and presented the teller with a demand note threatening injury if she was not given the teller's money. The teller gave approximately $3,240 to **MARTINEZ**, who then fled in an automobile driven by Williams.

4.   On or about October 22, 2005, defendant **MARTINEZ** and Williams drove to the Wachovia Bank branch located at 7030 Old Keene Mill Road, Springfield, Virginia, where **MARTINEZ** entered the bank and presented the teller with a demand note threatening injury if she was not given the teller's money. The teller gave approximately $6,000 to **MARTINEZ**, who then fled in an automobile driven by Williams.

5.   On or about November 4, 2005, defendant **MARTINEZ** and Williams drove to the Wachovia Bank branch located at 43780 Parkhurst Plaza, Ashburn, Virginia, where **MARTINEZ** entered the bank, brandished at a teller a .38 caliber revolver, which Williams had given her, robbed the branch of approximately $24,700, and then fled in an automobile driven by Williams.

6.   At all times pertinent to the indictment, the funds of the Wachovia Bank were insured by the Federal Deposit Insurance Corporation. Vienna and Fairfax, Prince William and Loudoun Counties, Virginia are located in the Eastern District of Virginia.

7.   Before the bank robberies described above, defendant **MARTINEZ** and Williams agreed on the roles each would play in committing the robberies. In particular, Williams typed and printed the demand note and drove the vehicle used to get to and flee from each of the banks, and **MARTINEZ** agreed to enter and rob each of the banks. During each of the robberies, defendant **MARTINEZ** and Williams remained in contact via cellular telephones. The actions of each were done knowingly, intentionally, unlawfully and not as a result of accident, mistake or other innocent reason.

Respectfully submitted,

Paul J. McNulty
United States Attorney

By: Michael E. Rich/Patricia T. Giles
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between me and the United States, I hereby stipulate that the above Statement of Facts is true and

accurate, and that had the matter proceeded to trial, the United States could have proved the same beyond a reasonable doubt.

_____
          Candice Rose Martinez
          Defendant

I am **CANDICE ROSE MARTINEZ'** attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

_____
          Michael S. Davis, Esq.